

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

BCS SOFTWARE, LLC,

Plaintiff

v.

ZOHO CORPORATION

Defendant

Case No. 6:21-cv-0051-ADA

JURY TRIAL DEMANDED

**CASE READINESS STATUS REPORT**

Plaintiff BCS Software, LLC (“Plaintiff”) and Defendant Zoho Corporation (“Defendant”) hereby provide the following status report in advance of the Case Management Conference (“CMC”).

**FILING AND EXTENSIONS**

Plaintiff’s Original Complaint was filed on January 19, 2021 [Dkt. No. 1]. There has been one extension for a total of 30 days for Defendant to file an answer or otherwise respond to Plaintiff’s Original Complaint [Dkt. No. 7a].

**RESPONSE TO THE COMPLAINT**

Defendant filed an Answer on March 18, 2021.

**PENDING MOTIONS**

There are currently no pending motions in this case. However, Defendant’s counsel has informed Plaintiff’s counsel that Defendant intends to file a motion for intra-district transfer to the Austin Division of the WDTX within the next week.

### **RELATED CASES IN THIS JUDICIAL DISTRICT**

There are three (3) other active cases filed by Plaintiff on one or more of the asserted patents in this judicial district. These include the following cases:

<b>Case</b>	<b>Case Filing Date</b>
<i>BCS Software, LLC v. Codelathe Technologies, 6:20-cv-0027-ADA</i>	January 19, 2021
<i>BCS Software, LLC v. Rackspace US, Inc., 6:21-cv-0119-ADA</i>	February 4, 2021
<i>BCS Software, LLC v. OpenText, Inc., 6:21-cv-0050-ADA</i>	January 19, 2021

### **IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings.

### **NUMBER OF ASSERTED PATENTS AND CLAIMS**

In its Complaint, Plaintiff asserted Claims 1-3 of US Patent No. 8,819,120 against Defendant. Additional claims will be asserted and charted as part of Plaintiff's Preliminary Infringement Contentions.

### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties do not request appointment of a technical advisor to assist the Court with claim construction or other technical issues.

### **MEET AND CONFER STATUS**

Counsel representing Plaintiff and Defendant conducted a meet and confer conference. Plaintiff believes that there are no pre-Markman issues to discuss at the CMC.

Dated: March 30, 2021

Respectfully Submitted

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